

UNITED STATES BANKRUPTCY COURT
DISTRICT OF NEW JERSEY

Christopher S. Martone, ESQ.
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Chapter 13

Case Number: 19-16325-SLM

In Re:

Adalberto Vasquez

Objection to Certification of Default

Please take notice that the Adalberto Vasquez, through his attorney hereby objects to the trustee's certification of default on the grounds including:

1. The debtor Adalberto Vasquez is in the midst of the lost mitigation program.
2. On December 23, 2019 the debtor made an application for extension of the loss mitigation period to March 23, 2020.
3. The debtor hereby requests that the Court schedule a hearing regarding the trustee's certification of default.

Martone & Associates, LLC
Attorneys for Debtor

By: /s/ Christopher S. Martone
Christopher S. Martone, ESQ.

DATED: December 23, 2019